Chapter 1

Purpose of and Need for Action

1.1 INTRODUCTION

This Environmental Assessment (EA) was prepared by Bonneville Power Administration (BPA) pursuant to regulations implementing the National Environmental Policy Act (NEPA) (42 USC 4321 et seq.), which requires federal agencies to assess the impacts their actions may have on the environment. Major federal actions significantly affecting the quality of the human environment must be evaluated in an Environmental Impact Statement (EIS). BPA prepared this EA to determine if the proposed action would cause effects that would warrant preparing an EIS.

1.2 UNDERLYING NEED FOR ACTION

BPA needs to take action because the existing 115-*kilovolt* (*kv*)¹ transmission line between Raymond and Cosmopolis in Washington is old, physically worn, and structurally unsound in places. Its condition creates risks to public and worker safety and to reliable electrical service.

The Raymond–Cosmopolis transmission line (Figure 1-1) was originally built in the 1920s and was acquired by BPA in the 1930s. BPA fitted portions of the line with new *conductors* (wires) and tower tops in 1952. Today, the existing structures and conductors show impact damage from trees falling on the line as well as normal deterioration due to age. Erosion and unstable soils have undermined the structure bases in some areas, and a number of the structures are leaning. Some structures do not have permanent access roads to reach them, which makes normal and emergency maintenance difficult and at times unsafe. The line's poor condition raises concerns about its overall structural reliability and the safety of BPA workers who must maintain it.

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1.3 PURPOSES OF ACTION

The project would be expected to accomplish the following purposes:

- Meet transmission system public safety and reliability standards set by the National Electrical Safety Code
- Minimize environmental impacts
- Improve safety for transmission line workers
- Minimize costs
- Use facilities and resources efficiently

¹ Terms defined in the glossary (Chapter 6) are shown in *bold, italicized* typeface the first time they are used.

Figure 1-1. Project Area Overview

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1.4 OTHER BPA PROJECTS IN THE AREA

BPA recently completed or is planning several other projects along the Raymond-Cosmopolis transmission line. Each of these projects, as described below, is considered a separate project because it is needed regardless of whether the actions evaluated in this EA take place.

The Raymond-Cosmopolis *danger tree* removal project was conducted in the summer and fall of 2002. Danger trees are trees that could, within a 15-year period, be a hazard to the transmission line by falling into it. The project was needed because damage from trees caused an average of ten outages per year along this line. Environmental impacts of the project were assessed in a Supplement Analysis (SA-65, BPA 2002), tiered to the BPA Transmission System Vegetation Management Program Final Environmental Impact Statement (EIS) (BPA 2000). Danger trees were removed in areas adjacent to the Raymond-Cosmopolis *right-of-way* (*ROW*), generally within 175 feet. As part of the project, a number of roads also were improved.

Ongoing *access road* maintenance was completed in the summer of 2002 to repair failed culverts and to improve roads that had become impassable. Some work was conducted in waterways, including replacing three culverts that are not in fish habitat, replacing four culverts in fish habitat with culverts that meet Washington Department of Fish and Wildlife (WDFW) Fish Passage Guidelines, and replacing one culvert with a bridge. This type of work normally is categorically excluded from further analysis under NEPA.

BPA is proposing repair work on the bridge over Butte Creek on the entrance road to Raymond Substation, to ensure it meets guidelines and specifications for heavy vehicles. Some instream work, including placement of riprap, would be proposed to protect the western abutment of the structure. Environmental analysis and NEPA review has not yet begun; it is not known if it will be accomplished in time for maintenance to proceed in 2003 2004, if funding is available.

BPA conducted *vegetation management* within the existing 50-foot wide ROW during the early spring and summer of 2003. Tall-growing woody vegetation within the 50-foot ROW that could pose an electrical hazard to the existing line was cut with a brush cutting machine or chainsaw. This work meets the guidelines established in the Vegetation Management Program EIS (BPA 2000); site-specific environmental impacts were analyzed in a Supplement Analysis to the EIS (SA-159, 2003).

1.5 PUBLIC INVOLVEMENT

On March 28, 2002, BPA sent a letter to people potentially interested in or affected by the proposed Raymond-Cosmopolis Transmission Line Rebuild Project, including adjacent landowners, public interest groups, local governments, Tribes, and state and Federal agencies. The letter explained the proposal, the environmental process, and how to participate. The letter also was posted on the BPA website.

BPA determined that eight Tribes have a potential interest in this project, based on their historic or current use of the land within the project area. BPA provided information and comment opportunities to Tribal representatives and contacted their designated cultural resources specialists.

BPA held two public meetings to describe the project and to solicit comments, one on April 17, 2002, in Cosmopolis and the other on April 18, 2002, in Raymond. On August 28, 2002, landowners along the transmission line corridor who had been inadvertently omitted from the project mailing list were sent project information and given an opportunity to comment.

Comments, both written and oral, that were received while the Preliminary EA was being prepared (from April to late November), were considered in the analysis.

Numerous individuals from the Raymond area, including public officials, requested that fiber optic cable be installed on the transmission line should the project go forward. BPA responded to the requests by designing structures that can accommodate fiber optic cable and by proposing to install fiber optic cable as part of the project.

Other questions or issues raised included:

- Where structures would be located
- What the structures would look like
- Health effects of living near a transmission line
- Minimizing costs related to environmental impact analysis
- Ways to minimize impacts to fish and wildlife habitat, species, and water resources
- How project activities would adversely affect communications facilities
- The need for reliable power in the Raymond area
- The historical significance of the line and the availability of an existing structure for display.

These issues are addressed in appropriate sections in the EA.

BPA released a Preliminary EA for review and comment. The Preliminary EA is posted on the BPA website (www.transmission.bpa.gov/projects). During the 2-week review period, BPA accepted comments orally, via e-mail, at public meetings, and by letter. Public meetings were held in Raymond and Cosmopolis in February of 2003. BPA considered all comments received during the review period in preparing the Final EA for the proposed project, and the Final EA includes responses to all substantive comments received in Chapter 8. Because the Final EA provides evidence that impacts from the proposal will not be significant, BPA will then determine whether intends to prepare an EIS or a Finding of No Significant Impact (FONSI) for the Proposed Action.